

08/18/2017

Legal Services Section  
P.O. Box 94125, Baton Rouge, LA 70804-9125  
(225) 922-0415

MGA INSURANCE COMPANY, (INC.)  
RICHARD M. BUXTON, SENIOR VICE PRESIDENT  
P. O. BOX 189023  
DALLAS, TX 75218-9023

Suit No.: 602620  
1ST JUDICIAL DISTRICT COURT  
CADD0 PARISH

URSULA DAVIS  
vs  
MORGAN LEBLANC, ET AL

Dear Sir/Madam:

I am enclosing citation served in regard to the above entitled proceeding. Please call the attorney that filed this document if you have any questions regarding this proceeding. If you received this document in error, please return it to the above address with a letter of explanation.

Yours very truly,

TOM SCHEDLER  
Secretary of State

Served on: TOM SCHEDLER  
Served by: E CUMMINS

Date: 08/17/2017  
Title: DEPUTY SHERIFF

No: 1048504

KO



**Citation**

SY

DAVIS, URSULA

VERSUS

LEBLANC, MORGAN ETAL

NO. 602620-B  
 STATE OF LOUISIANA  
 PARISH OF CADDO  
 FIRST JUDICIAL DISTRICT COURT

THE STATE OF LOUISIANA: TO MGA INSURANCE COMPANY INC  
 THRU HONORABLE SECRETARY OF STATE  
 BATON ROUGE LA 70809

of the Parish of EAST BATON ROUGE

YOU HAVE BEEN SUED.

Attached to this Citation is a certified copy of the Petition.\* The petition tells you what you are being sued for.

You must EITHER do what the petition asks, OR, within FIFTEEN (15) days after you have received these documents, you must file an answer or other legal pleadings in the Office of the Clerk of this Court at the Caddo Parish Court House, 501 Texas Street, Room 103, Shreveport, Louisiana.

If you do not do what the petition asks, or if you do not file an answer or legal pleading within FIFTEEN (15) days, a judgment may be entered against you without further notice.

This Citation was issued by the Clerk of Court for Caddo Parish, on this date August 04, 2017.

\*Also attached are the following:

XX REQUEST FOR ADMISSIONS OF FACTS

XX INTERROGATORIES

XX REQUEST FOR PRODUCTION OF DOCUMENTS

MIKE SPENCE, CLERK OF COURT

By: 

Deputy Clerk

SERVED ON  
 TOM SCHEDLER

AUG 17 2017

SECRETARY OF STATE  
 COMMERCIAL DIVISION

F. Q. HOOD

Attorney

A TRUE COPY -- ATTEST

  
 Deputy Clerk

These documents mean you have been sued. Legal assistance is advisable, and you should contact a lawyer immediately. If you cannot find a lawyer, please go to [www.shreveportbar.com](http://www.shreveportbar.com) and click on the Lawyer Referral Service link, or go to the Shreveport Bar Center on the third Monday of each month from 5:30 - 7:30 for a free seminar. If eligible, you may be entitled to legal assistance at no cost to you through Legal Services of North Louisiana, Inc. Please call 222-7281 for more information.

If you are a person with a disability, please contact the Clerk of Court's office for information regarding accommodation and assistance.

**SERVICE COPY**

URSULA DAVIS

NUMBER:

SECTION:

VERSUS

FIRST JUDICIAL DISTRICT COURT

MORGAN LEBLANC AND MGA  
INSURANCE COMPANY, INC. AND  
STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY

CADDO PARISH, LOUISIANA

### PETITION FOR DAMAGES

NOW INTO COURT, through undersigned counsel, comes and appears URSULA DAVIS, of the full age of majority and a resident of Shreveport, Louisiana, who respectfully represent to the Court that:

1.

Made defendants in this petition are the following:

1. MORGAN LEBLANC, a resident of Gladewater, Texas;
2. MGA INSURANCE COMPANY INC., a foreign insurance company authorized to and doing business in the State of Louisiana; and
3. STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, an insurance company authorized to and doing business in the State of Louisiana.

2.

The parties hereto, the subject matter hereof, and all matters and things contained are within the jurisdiction of this Honorable Court.

3.

The wrongful act which injured the Petitioner occurred on or about September 2, 2016, on Mansfield Road in Shreveport, Louisiana.

4.

MGA INSURANCE COMPANY, INC. was the liability insurer for a 2012 Honda CP which was owned and driven by MORGAN LEBLANC. Said insurance policy was in full force and effect and covered all negligent acts of MORGAN LEBLANC.

5.

URSULA DAVIS was driving a 2006 Pontiac G6 and was stopped in traffic when the vehicle driven by MORGAN LEBLANC struck the rear of the Petitioner's vehicle.

6.

Petitioner avers that the liability policy of MORGAN LEBLANC is insufficient to satisfy the claims herein.

7.

Petitioner avers that STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY provided a policy of underinsured motorist and/or medical payments coverage which was in full force and effect at the time of the accident.

8.

URSULA DAVIS was exercising due care and caution and was completely free from any and all negligence, fault, or breach of duties in any manner which contributed to the injuries and damages sustained.

9.

The negligence, fault, and breach of duty of MORGAN LEBLANC consists of the following non-exclusive particulars:

1. Failure to maintain a proper outlook;
2. Failure to keep vehicle under proper control;
3. Following too closely;
4. Inattentive and distracted driving; and
5. Disregard for the rights and safety of others, particularly that of the Petitioner.

10.

The wrongful act caused injuries to URSULA DAVIS, which have required medical treatment.


11.

URSULA DAVIS states that as a result of this wrongful act caused by the negligence, fault, and breach of duties of MORGAN LEBLANC, she has suffered the following damages:

- A. Past, present and future physical pain and suffering
- B. Past, present and future mental pain and anguish
- C. Past, present and future medical care expenses
- D. Disability
- E. Loss of enjoyment of life
- F. Loss of wages and economic opportunity

WHEREFORE, Petitioner prays that:

1. MORGAN LEBLANC and MGA INSURANCE COMPANY, INC. and STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY each be served with a copy of this petition and cited to appear and answer same;
2. After all legal delays and due proceedings had, that there be judgment herein in favor of URSULA DAVIS and against MORGAN LEBLANC and MGA INSURANCE COMPANY, INC. and STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY for relief for such damages; general, special, exemplary and punitive, as may be reasonable, together with legal interest thereon from the date of judicial demand until paid, and all costs of these proceedings;
3. For all other relief, both general and equitable as may be necessary in the premises.

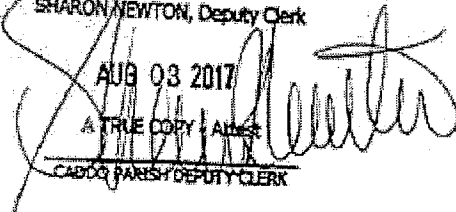
  
F. Q. Hood, Jr.  
Louisiana Bar # 17626  
Christopher C. Broughton  
Louisiana Bar # 30413  
1503 Doctors Drive  
Bossier City, Louisiana 71111  
Telephone: (318) 742-1000  
Facsimile: (318) 747-1499

**SERVICE INSTRUCTIONS:**

Please prepare Long Arm Citation for:  
MORGAN LEBLANC  
16636 CR 3111  
Gladewater, Texas 75647

STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY  
through Louisiana Secretary of State  
8585 Archives Avenue  
Baton Rouge, Louisiana 70809

MGA INSURANCE COMPANY, INC.  
through Louisiana Secretary of State  
8585 Archives Avenue  
Baton Rouge, Louisiana 70809

ENDORSED FILED  
SHARON NEWTON, Deputy Clerk  
AUG 03 2017  
A TRUE COPY  
CADDOPARISH DEPUTY CLERK  


URSULA DAVIS

NUMBER:

SECTION:

VERSUS

FIRST JUDICIAL DISTRICT COURT

MORGAN LEBLANC AND MGA  
INSURANCE COMPANY, INC. AND  
STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY

CADDO PARISH, LOUISIANA

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

URSULA DAVIS herein, propound the following interrogatories to MORGAN LEBLANC and MGA INSURANCE COMPANY, INC. in accordance with the Louisiana Code of Civil Procedure. Further, URSULA DAVIS propound the following requests for production of documents to MORGAN LEBLANC and MGA INSURANCE COMPANY, INC. in accordance with the Louisiana Code of Civil Procedure.

Pursuant to Louisiana Code of Civil Procedure you are requested to answer separately and fully in writing under oath, the interrogatories hereinafter set forth and served herewith and to send a copy of your answer to URSULA DAVIS through undersigned counsel, within fifteen (15) days from the date of service hereof.

Pursuant to Louisiana Code of Civil Procedure the following interrogatories and requests for production of documents are deemed continuing interrogatories and requests, requiring supplemental answers and production of documents thereto to be timely given in the event that information is discovered, acquired or becomes known to you which would require amendment or supplementation of the answers to these interrogatories in order for your answers and responses to be proper, complete and truthful.

INTERROGATORY NUMBER 1:

Give the following information pertaining to MORGAN LEBLANC:

- A. Full legal name, current address and phone number; and
- B. Social Security number and Driver's license number.

INTERROGATORY NUMBER 2:

State whether MORGAN LEBLANC is married at the present time, and if so, give the following information:

- A. Spouse's full legal name, current address and phone number; and
- B. Spouse's employer's name and address.



INTERROGATORY NUMBER 3:

Identify each employer for whom MORGAN LEBLANC has worked during the last five (5) years and set forth as to each:

- A. The street address and telephone number;
- B. Job title and duties;
- C. Rate of pay and number of hours worked each week; and
- D. Name, address and telephone number of your immediate supervisor.

INTERROGATORY NUMBER 4:

State whether MORGAN LEBLANC has been involved in any motor vehicle collisions, either as a driver or passenger, within the past ten (10) years, for each such collision, provide the following information:

- A. The date, time and location and concise description of each collision;
- B. Defendant's involvement in each collision (driver, passenger, witness, etc.); and
- C. Whether defendant was found to be at fault.

INTERROGATORY NUMBER 5:

State whether MORGAN LEBLANC has ever received any tickets and/or moving violations, if yes, set forth:

- A. The parish and/or county and state where received; and
- B. The nature and disposition of such charge, whether by conviction, plea of guilty, or plea of nolo contendere.

INTERROGATORY NUMBER 6:

List each and every policy of automobile liability insurance or self insurance provision, primary, excess, and umbrella policies, that were issued to or may provide coverage to MORGAN LEBLANC and/or the vehicle that MORGAN LEBLANC was driving at the time of the accident that is the subject of this lawsuit and for each such policy give the full name and address of the carrier, the policy number and the liability limits of coverage.

REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER 1:

By way of a request for production of documents, furnish a certified copy of each of the policies of insurance referred to in Interrogatory Number 6.

INTERROGATORY NUMBER 7:

State, in detail, how MORGAN LEBLANC contends the accident occurred.

INTERROGATORY NUMBER 8:

State where MORGAN LEBLANC was coming from and going to at the time of the accident, and the purpose of the travel.

INTERROGATORY NUMBER 9:

State whether MORGAN LEBLANC's vehicle sustained any property damage as a result of the accident. If so, state the amount thereof, the names and addresses of each person, firm, or corporation from whom estimates of repairs were obtained, the names and addresses of the person or firm who made the repairs, and the exact amount paid for said repairs.

REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER 2:

By way of a request for production of documents, attach copies of any and all estimates or documentation regarding said repairs to the copy of the answers to these interrogatories to be served upon plaintiff's attorney.

INTERROGATORY NUMBER 10:

State if MORGAN LEBLANC received any medical attention, including examination and/or treatment, for any injury sustained in the accident. If yes, state whether any physicians have rendered written medical reports relative to treatment or examination. If so, please identify each as follows:

- A. Date of report; and
- B. Name and address of person presently having possession of said report.

REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER 3:

By way of a request for production of documents, attach copies of said reports to the copy of the answers to these interrogatories to be served upon plaintiff's attorney.

INTERROGATORY NUMBER 11:

Give the names, addresses and telephone numbers of all parties of whom you are aware witnessed the accident of September 2, 2016, or who may have any knowledge or information of same.

INTERROGATORY NUMBER 12:

State the names, addresses and telephone numbers of all expert and lay witnesses whom you will call to testify at the trial of this matter and give the nature of the testimony you intend to elicit from each said witness.



INTERROGATORY NUMBER 13:

For each person who investigated the cause and circumstances of the accident on the Defendants' behalf, provide the following information:

- A. Name, address and telephone number;
- B. Relationship to the defendant;
- C. Occupation; and
- D. Was a written report made of this investigation?

REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER 4:

By way of a request for production of documents, furnish a copy of the written report referred to in Interrogatory Number 13.

INTERROGATORY NUMBER 14:

If the Defendants, their agent or representative, has in their possession or control photographs, diagrams and/or any other depictions of the accident scene or which are otherwise connected with the accident, please provide the following information for each such depiction:

- A. Identify each such document in detail;
- B. State in whose custody it is;
- C. Indicate by whom each such depiction was made; and
- D. Indicate the location in which each such depiction was made.

REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER 5:

By way of a request for production of documents, attach a copy and/or copies of each photograph, diagram or any other depiction referred to in Interrogatory Number 14.

INTERROGATORY NUMBER 15:

Describe fully, and in detail, all documentary or physical evidence you intend to introduce at the trial of this matter.

REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER 6:

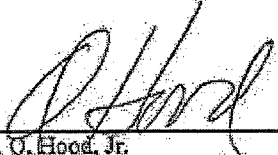
By way of a request for production of documents, produce copies of all documentary or physical evidence, including any statements taken or reports prepared by you or your insurance company.

INTERROGATORY NUMBER 16:

Do the Defendants contend they have any defenses to claims made in this matter? If yes; then what defenses do you claim and what specific facts do you depend on to prove those defenses?

INTERROGATORY NUMBER 17:

State the names and addresses of all other entities that the defendant claim may be responsible for plaintiff's damages.

  
F. Q. Hood, Jr.  
Louisiana Bar # 17626  
Christopher C. Broughton  
Louisiana Bar # 30413  
1503 Doctors Drive  
Bossier City, Louisiana 71111  
Telephone: (318) 742-1000  
Facsimile: (318) 747-1499

PLEASE SERVE WITH THE PETITION

URSULA DAVIS

NUMBER:

SECTION:

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FIRST JUDICIAL DISTRICT COURT

MORGAN LEBLANC AND MGA  
INSURANCE COMPANY, INC. AND  
STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY

CADDO PARISH, LOUISIANA

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

URSULA DAVIS, herein, propounds the following interrogatories and requests for production of documents to STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, in accordance with the Louisiana Code of Civil Procedure.

Pursuant to Louisiana Code of Civil Procedure you are requested to answer separately and fully in writing under oath, the interrogatories hereinafter set forth and served herewith and to serve a copy of your answer upon URSULA DAVIS through undersigned counsel, within fifteen (15) days from the date of service hereof.

Pursuant to Louisiana Code of Civil Procedure the following interrogatories and requests for production of documents are deemed continuing interrogatories and requests, requiring supplemental answers and production of documents thereto to be timely given in the event that information is discovered, acquired or becomes known to you which would require amendment or supplementation of the answers to these interrogatories in order for your answers and responses to be proper, complete and truthful.

INTERROGATORY NUMBER 1:

Give the names, addresses and telephone numbers of all parties of whom you are aware witnessed the accident of September 2, 2016, or who has any knowledge or information of same.

INTERROGATORY NUMBER 2:

State the names, addresses and telephone numbers of all expert and lay witnesses whom you will call to testify at trial and give the nature of the testimony you intend to elicit from each said witness.

INTERROGATORY NUMBER 3:

For each person who investigated the cause and circumstances of the accident on the Defendant's behalf, provide the following information:

- A. Name, address and telephone number;
- B. Relationship to the defendant and occupation;
- C. Was a written report made of this investigation?

REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER 1:

By way of a request for production of documents, furnish a copy of the written report referred to in Interrogatory Number 3.

INTERROGATORY NUMBER 4:

If the Defendant, their agent or representative, has in their possession or control photographs, diagrams and/or any other depictions of the accident scene or which are otherwise connected with the accident, please provide the following information for each such depiction:

- A. Identify each such document in detail;
- B. State in whose custody it is;
- C. Indicate by whom each such depiction was made; and
- D. Indicate the location in which each such depiction was made.

REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER 2:

By way of a request for production of documents, attach a copy and/or copies of each photograph, diagram or any other depiction referred to in Interrogatory Number 4.

INTERROGATORY NUMBER 5:

Describe fully, and in detail, all documentary or physical evidence you intend to introduce at the trial of this matter.

REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER 3:

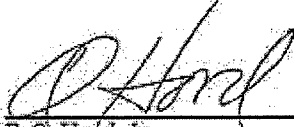
By way of a request for production of documents, produce copies of all documentary or physical evidence, including any statements taken or reports prepared by you or your insurance company.

INTERROGATORY NUMBER 6:

Does the Defendant contend they have any defenses to claims made in this matter? If yes, what defenses do you claim and what specific facts do you depend on to prove those defenses?

INTERROGATORY NUMBER 7:

State the names and addresses of all other entities that the Defendant's claim may be responsible for plaintiff's damages.

  
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PLEASE SERVE WITH THE PETITION

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MORGAN LEBLANC AND MGA  
INSURANCE COMPANY, INC. AND  
STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY

CADDO PARISH, LOUISIANA

### REQUEST FOR ADMISSION OF FACTS

NOW INTO COURT, through undersigned counsel, comes and appears URSULA DAVIS, who for the purpose of propounding to STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY the following request for admission of facts. Petitioner requests that the Defendant admit or deny the truth of the following facts within fifteen (15) days after receipt of the request:

#### REQUEST FOR ADMISSION OF FACT NUMBER 1:

Admit that on September 2, 2016, URSULA DAVIS was involved in an automobile accident on Mansfield Road in Shreveport, Louisiana with the vehicle driven by MORGAN LEBLANC.

#### REQUEST FOR ADMISSION OF FACT NUMBER 2:

Admit that on September 2, 2016, STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY was the underinsured motorist and/or medical payments insurer of URSULA DAVIS.

#### REQUEST FOR ADMISSION OF FACT NUMBER 3:

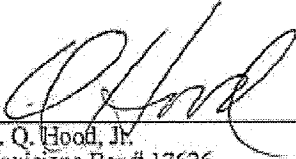
Admit that on September 2, 2016, the vehicle driven by MORGAN LEBLANC struck the rear of the vehicle driven by URSULA DAVIS.

#### REQUEST FOR ADMISSION OF FACT NUMBER 4:

That on September 2, 2016, MORGAN LEBLANC was an underinsured driver.

#### REQUEST FOR ADMISSION OF FACT NUMBER 5:

That MORGAN LEBLANC's actions were the sole cause of the accident from which this lawsuit arose.



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PLEASE SERVE WITH THE PETITION

RECEIVED  
AUG 16 2017  
E.B.R. SHERIFF'S OFFICE



URSULA DAVIS

NUMBER:

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FIRST JUDICIAL DISTRICT COURT

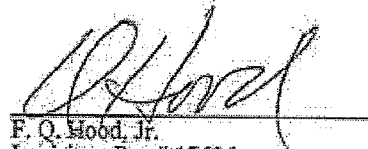
MORGAN LEBLANC AND MGA  
INSURANCE COMPANY, INC. AND  
STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY

CADDO PARISH, LOUISIANA

REQUEST FOR NOTICE OF TRIAL AND JUDGMENT

Pursuant to the Louisiana Code of Civil Procedure, through undersigned counsel, comes and appears URSULA DAVIS, who hereby requests written notice of the date set for trial of the above-numbered and entitled cause, or of the date set for trial or hearing of any pleadings or motions herein, at least ten (10) days before any trial or hearing date.

Petitioner further request written notice of the signing of any final Judgment or of the rendition of any Interlocutory Order or Judgment in said cause as provided by the Louisiana Code of Civil Procedure.



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